

EXHIBIT Q

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW
YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN)

DECLARATION OF DAVID J. KING, JR.

I, David J. King, Jr. pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below.
The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.
2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.
3. On September 11, 2001, I was present at the Pentagon in 1D518, which is on the left edge of where the plane that attacked the Pentagon crashed.
4. On September 11, 2001 I was employed in the United States military and working as a Major, U.S Army Special Forces for Deputy Chief of Staff Army, G8.
5. I was in my office in the Pentagon when the plane hit and I sustained significant physical injuries in an attempt to rescue my fellow soldiers. I do not remember the sound of the explosion as the plane hit, but I do remember my entire office erupting into flame. I was surrounded by rubble. The reason I was still alive is that one of the huge columns and

two four-drawer safe filing cabinets protected me from the blast. My little corner was basically untouched by the fire. Others in my office - Staff Sergeant White and Lieutenant Colonel Dickerson were killed in the attack. The experience of that day was the most harrowing of my life. Despite intense training and being deployed multiple times with the military, I had never experienced anything like this.

6. After the initial blast, I attempted to get to SSG White because I knew she had been sitting at her desk a few feet away. The damage to the ceiling from the explosion was at the edge of her desk. I ran over to her desk and started to bash through the debris hanging there burning; 50 years of various communications cables, asbestos and filth. Now all burning as it hung like a wall between SSG White and me. This is how I got the burns on my arms. I never saw her. I then tried to get to LTC Dickerson to see if I could help him, but the whole room was completely up in flames. I could not even see his desk. I searched for an escape route but when I looked out into the hallway there was fire in every direction. I thought about getting down on the floor and crawling but the whole carpet was on fire and the room was filling with smoke. I could smell the jet fuel. I looked down and realized my polyester pants were melting to my legs in spots, so I beat-out the flames as I returned to my protected area. At that point my arms, legs and face were burnt. The skin was hanging from my arms. I saw a picture of my three boys on my desk and I knew I had to get out of there for their sake. I looked around and saw a hole had been blown open behind me at the top of the wall separating the D and E rings. I crawled up over the wall and dropped into the E-Ring. Others from the next office away from the blast were doing the same thing. I assisted them getting out of their office. Everything around me looked surreal. Everything in the E-ring had been leveled and

there were small pockets of flames visible through the smoke and the dim light coming from where the windows had been. A Pentagon Security Officer was yelling from the building's exit in the direction of the explosion. We headed towards his voice and exited. I ran into Colonel Delaney from a G8 office down the hall and I provided a SITREP for my office. Basically it was informing him LTC Dickerson and SSG White were missing. He was writing this onto a 3x5 card with a Sharpie. I asked him to call my mother and ex-wife and he wrote-down their numbers. He then wrote their phone numbers on my shirt. I asked him to also write my blood type, and "no meds, no allergies" on my shirt, which he did. He directed me to a triage point across the helipad by the road. I sat on the guardrail and two of my coworkers from an office that had been down the hall came over to me and peeled-off my pants from my skin and removed my shoes. At that point, I still was not feeling any pain yet, as the adrenaline was still pumping and I was probably going into shock. After about 20 minutes the MEDIC placed me on a stretcher and then an ambulance evacuated me to the Burn Unit at the Washington Hospital Center.

7. As a result of these terrorist attacks, I suffered the following specific physical injuries on September 11, 2001: third and fourth degree burns on 22% of my total body surface area requiring a six week hospital stay, multiple surgeries, and significant physical rehabilitation therapies over the next year. Ultimately, Veterans Affairs ("VA") rated my disability as follows: 30% for burn scars of the left upper extremity, 40% for burn scars of the right upper extremity, and 50% for facial burn scars; 40% for Traumatic Brain Injury ("TBI") from the explosion; and 50% for Post Traumatic Stress Disorder ("PTSD") based on the various sights, sounds, and traumas I witnessed on 9/11. The VA ratings are not cumulative, but build upon one another—example: a 50% and 40% equals a 70% total

rating. I am still affected by all of these injuries, to some extent.

8. The effects of PTSD are still with me to this day. Despite 29 years in the U.S. Army—most of it in Special Forces—I had never experienced anything like that day. For years my sleep was interrupted with nightmares and my personnel interactions continue to suffer. My executive functions are not properly operational, which affects recall capability. While some PTSD and TBI treatments have helped, the experience will never leave me.
9. I sought and continue to seek medical attention for my injuries. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.
10. I suffered, and continue to suffer, severe emotional and physical distress as a result of the above terrorist attacks.
11. I previously pursued a claim through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 3rd day of January 2020



DAVID KING

Signature of Declarant

Exhibits Filed Under Seal